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DEPARTMENT OF WATER AND POWER

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March 25, 1983

Mr. James H. Anthony
Project Director
Intermountain Power Project
931 General Office Building

Meeting Between the Utah Department of Health (DOH) and the Department Concerning Fugitive Emissions and Computer Modeling for the Intermountain Power Project (IPP)

On March 15, 1983, Messrs. Stephen A. Clark (Advanced Projects, Environmental and Regulatory Affairs (APERA)), Timothy L. Conkin (APERA), James F. Bowers (Principal Scientist, H. E. Cramer Company), Alan Anderson (Staff Scientist, H. E. Cramer Company) and Robert Bryan (Technical Director of Air Quality Planning and Testing, Engineering-Science, Inc.) met in Salt Lake City, Utah, with Messrs. David O. Prey (Air Quality Technician, DOH), David Q. Kopta (Public Health Engineer, DOH) and Carl Broadhead (Public Health Engineer, DOH).

The purpose of the meeting was to discuss the methodology to be used to quantify the fugitive emissions and to computer model the air quality impacts of the two-generating unit IPP design. The following is a summary of the meeting.

1. Quantification of Fugitive Emissions:

Mr. Bryan made a presentation to Messrs. Prey, Kopta and Broadhead regarding the general technique to be used to quantify the fugitive emissions for IPP. Mr. Bryan discussed the various literature sources of emission factors and expressed concern at the inaccuracy of these factors. However, Mr. Bryan explained that he will select factors that best apply to plant design and operations at IPP. The DOH appeared receptive to this approach.

It was pointed out that IPP is attempting to quantify emissions with real and not conceptual design as was previously done. It was further pointed out that the two-unit design has just recently become available.

The DOH expressed concern at the inaccuracy of fugitive emission factors and stated that they had not determined (except for haul roads) the factors appropriate for each emission source. The DOH stated that IPP could present emission factors to the DOH and justify their appropriateness. The DOH recommended that the emission factors selected be reviewed and approved by the DOH prior to the H. E. Cramer Company performing computer modeling. The following was concluded concerning fugitive emissions.

a. One emission factor previously used for determination of IPP emissions from coal piles was rejected by the DOH because it overpredicts emissions.

b. The use of a DOH-approved emission factor for haul roads is required for emissions estimates at IPP.

c. The DOH recognizes a day with snow cover as a rainy day for control of fugitive emissions.

2. Computer Modeling:

Mr. Bowers made a presentation to Mr. Prey regarding the history and validation of the computer modeling methodology (SHORTZ and LONGZ) to be used for IPP and provided Mr. Prey with ample literature to analyze the technique in detail. Mr. Prey felt that the methodology is sufficient in detail and did not express concern. However, Mr. Prey will review the literature, talk with representatives of the Environmental Protection Agency (Mr. Bowers provided the names) concerning the validity of the methodology and will accept or reject the methodology based on this input.

It was concluded that Mr. Prey will discuss technical issues with Mr. Bowers and will discuss policy decisions with Mr. Conkin or Mr. Clark. Mr. Prey would not commit to a rigid timeframe for providing his decision but implied that the decision would be made within two weeks.

If you have any questions or comments, please contact Mr. Timothy L. Conkin on extension 5794.

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